

Electronically FILED by
Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By G. Carini, Deputy Clerk

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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JEFF ROSS, ROXANNE OLIVEIRA, and
NATASHA SCOTT, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

PANDA RESTAURANT GROUP, INC.,
and DOES 1-50, inclusive,

Defendant.

Case No. 21STCV03662
(Assigned to Hon. Lawrence P. Riff, Dept. 7)

CLASS ACTION

**NOTICE OF MOTION AND UNOPPOSED
MOTION FOR ATTORNEYS’ FEES,
EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

**[Memorandum of Points and Authorities;
Declaration of Jeffrey D. Kaliel; [Proposed]
Order; *Ex Parte* Application to File
Memorandum in Excess of Page Limit; and
[Proposed] Order Granting *Ex Parte*
Application filed concurrently herewith]**

**Hearing Date: November 8, 2023
Time: 10:00 a.m.
Department: 7**

Action filed: January 29, 2021
SAC Filed: December 5, 2022
Trial date: None

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TO THE COURT, TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 8, 2023, at 10:00 a.m., or as soon thereafter as counsel may be heard in this Court in Department 7, located at the Spring Street Courthouse, 312 Spring Street, Los Angeles, California 90012, Plaintiffs Jeff Ross, Roxanne Oliveira, and Natasha Scott will and hereby do move for an order:

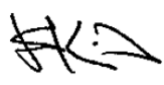
- 1. Awarding attorneys’ fees in the amount of \$462,000.00 and expenses in the amount of \$16,500.00;
- 2. Awarding Class Representatives a service award of \$5,000.00 each.

A Copy of the [Proposed] Order Awarding Attorneys’ Fees, Expenses and Class Representative Service Awards is being filed concurrently with this Motion.

This Unopposed Motion is based on this Notice of Motion; the Memorandum of Points and Authorities; the Declaration of Jeffrey D. Kaliel; the papers and pleadings on file with the Court; and on such other evidence, information, or material as may be presented to the Court.

Dated: July 5, 2023

KALIELGOLD PLLC

By: 

Jeffrey D. Kaliel
Sophia G. Gold
Attorneys for Plaintiffs and the Class

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the District of Columbia. I am over the age of 18 and not a party to the within action. My business address is 1100 15th Street NW, 4th Floor, Washington, DC 20005.

On **July 5, 2023**, I served the document(s) described as:

NOTICE OF MOTION AND UNOPPOSED MOTION FOR ATTORNEYS' FEES, EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARDS

on the interested parties in this action by sending [] the original [or] [✓] a true copy thereof [✓] to interested parties as follows [or] [] as stated on the attached service list:

SEE ATTACHED SERVICE LIST

[] **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with KalieGold PLLC's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

[] **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address ngarcia@kalielgold.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] **BY NOTICE OF ELECTRONIC FILING:** I electronically served the document(s) with the by using the CaseAnywhere system. Participants in the case who are registered CaseAnywhere users will be served by the CaseAnywhere system. Participants in the case who are not registered CaseAnywhere users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this **July 5, 2023**, at Los Angeles, California.

NEVA R. GARCIA
Type or Print Name



Signature

SERVICE LIST

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